

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Melissa Thomas, on behalf of herself
individually and all others similarly
situated,

Plaintiff,

v.

Pawn America Minnesota, LLC, Payday
America, Inc., and PAL Card Minnesota,
LLC,

Defendants.

Case No. 21-cv-02554 (PJS/HB)

Randell Huff, on behalf of himself
individually and all others similarly
situated,

Plaintiff,

v.

Pawn America Minnesota, LLC, Payday
America, Inc., and PAL Card Minnesota,
LLC,

Defendants.

Case No. 21-cv-02569 (PJS/HB)

Megan Murillo, on behalf of herself
individually and all others similarly
situated,

Plaintiff,

v.

Case No. 21-cv-02574 (PJS/HB)

Pawn America Minnesota, LLC, Payday America, Inc., and PAL Card Minnesota, LLC,

Defendants.

**PLAINTIFFS’ UNOPPOSED MOTION FOR CONSOLIDATION
OF RELATED ACTIONS**

Pursuant to Federal Rules of Civil Procedure 42(a) and Judicial Orders for Reassignment of Related Cases, Plaintiffs in the above-captioned actions respectfully move to consolidate three related putative class actions now pending before this Court:

- *Melissa Thomas v. Pawn America Minnesota, LLC, Payday America, Inc., and PAL Card Minnesota, LLC*, No. 21-cv-02554 (PJS/HB) (“Thomas”) filed on November 23, 2021;
- *Randell Huff v. Pawn America Minnesota, LLC, Payday America, Inc., and PAL Card Minnesota, LLC*, No. 21-cv- 02569 (PJS/HB) (“Huff”) filed November 24, 2021; and
- *Megan Murillo v. Pawn America Minnesota, LLC, Payday America, Inc., and PAL Card Minnesota, LLC*, No. 21-cv-02574 (PJS/HB) (“Murillo”) filed on November 29, 2021;

and to adjourn all deadlines for all Defendants to file a responsive pleading until Plaintiffs’ Court-appointed interim leadership has been ordered by the Court and Plaintiffs’ interim leadership files a Consolidated Complaint, and an appropriate responsive pleading schedule is established.

This Motion is based upon the Memorandum of Law filed contemporaneously herewith, and upon all files, records, and proceedings in this matter.

December 6, 2021

/s/ Bryan L. Bleichner

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* Pro Hac Vice Application Forthcoming